

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**ROOT, INC., et al.,** : Case No.: 2:23-cv-00512

**Plaintiffs, :** Judge Sarah Morrison

**v.** :

**BRINSON CALEB “BC” SILVER, et al.,** :

Defendants.

**MOTION FOR LEAVE TO EXECUTE SALE OF PROPERTY**

Pursuant to the Court’s Agreed Preliminary Injunction (ECF No. 42), Defendants, Brinson Caleb “BC” Silver, Eclipse Home Design, LLC and Collateral Damage, LLC (“Defendants”), were permitted to take commercially reasonable steps towards securing the sale of certain properties. The Preliminary Injunction also requires Defendants to provide copies of any proposed sale contract to all parties and to obtain leave of Court before accepting any offer. Consistent with the Preliminary Injunction Eclipse has received an offer for the sale of the property located at 13105 Biscayne Island Terrace, Miami, Florida 33181.

Eclipse desires to accept the offer and provided a copy of the proposed contract to the Court and all other parties. Counsel for Plaintiff Root indicates Root does not object to the sale. Accordingly, Eclipse respectfully requests the Court grant leave to complete the sale of the above referenced property, consistent with the terms of the Preliminary Injunction.

Respectfully submitted,

/s/ Aaron M. Jones

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**Approved by:**

/s/ William D. Kloss, Jr. (per auth. 4.6.23)

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 6<sup>th</sup> day of April 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

A copy was also sent by ordinary U.S. Mail, postage prepaid, to the following:

Paige McDaniel  
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/s/ Aaron M. Jones  
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4884-9829-4609, v. 2